

EXHIBIT NO. 5

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3 CASE NO. 2:23-cv-09412 CBM(AGR)

4 D.S., a minor by and through his
5 guardian ad litem Elsa Acosta,
6 individually and as successor-in-interest to
7 William Salgado; C.S., a
8 minor by and through his guardian ad
9 litem Elsa Acosta, individually and as
10 successor-in-interest to William
11 Salgado;

12 Plaintiffs,

13 v.

14 CITY OF HUNTINGTON PARK;
15 NICK NICHOLS; RENE REZA;
16 MATTHEW RINCON; APRIL
17 WHEELER; and DOES 5 through 10,
18 inclusive,

19 Defendants.

20
21 TELECONFERENCE
22 DEPOSITION OF KARLA VANESSA BLANDON

23 January 9, 2025
24 STENO
25 Aventura, Florida 33180
1:17 p.m. - 2:16 p.m.

Melanie Stinson-Konstantinidis, RPR
Registered Professional Reporter

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

A P P E A R A N C E S:

On behalf of the Plaintiff:
BENJAMIN LEVIN, ESQUIRE
LAW OFFICES OF DALE K. GALIPO
21800 Burbank Boulevard, Suite 310
Woodland Hills, California 91367
valentine@galipolaw.com

On behalf of the Plaintiff:
CHRISTOPHER L. HOLM, ESQUIRE
CARRAZCO LAW, APC
18301 Irvine Boulevard
Tustin, California 92780
hendolaw@gmail.com

On behalf of the Defendant:
ROGER A. COLVIN, ESQUIRE
ALVAREZ-GLASMAN & COLVIN
13181 Crossroads Parkway North
Suite 400 - West Tower
City of Industry, California 91746
rcolvin@agclawfirm.com

ALSO PRESENT: ARIEL TORRONE

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

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W-I-T-N-E-S-S

KARLA VANESSA BLANDON

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DIRECT EXAMINATION BY MR. COLVIN

4

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

1 Thereupon:

2 ARIEL TORRONE,
3 was duly sworn to truthfully and faithfully
4 interpret all questions posed to the witness,
5 and all answers given by the witness:

6 P R O C E E D I N G S

7 - - -

8 Deposition taken before MELANIE
9 STINSON-KONSTANTINIDIS, RPR, Registered
10 Professional Reporter and Notary Public in and for
11 the State of Florida at Large, in the above cause:
12 Whereupon,

13 KARLA VANESSA BLANDON,
14 having been sworn in, testified as follows:

15 DIRECT EXAMINATION

16 BY MR. COLVIN:

17 Q. Good afternoon, Ms. Blandon, could you
18 please say your full name for the record?

19 A. Yes. Karla Vanessa Blandon.

20 Q. Have you been known by any other names
21 in your life?

22 A. No.

23 Q. What is your date of birth, please?

24 A. 1991.

25 Q. What month and day?

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

1 Q. What are the ages of your children?

2 A. Sixteen and eleven.

3 Q. What is the name of your biological
4 father?

5 A. William Osmar Castillo Miranda.

6 Q. And what is the name of your
7 biological mother?

8 A. Jerminia Desocoro Blandon.

9 Q. So, what is your relationship with
10 William Salgado?

11 A. Brother.

12 Q. Do you know who William Salgado's
13 biological mother is?

14 A. Juana Miranda.

15 Q. Do you know who William Salgado's
16 biological father is?

17 A. Yes.

18 Q. Who is that?

19 A. William Osmar Castillo Miranda.

20 Q. Did you have any brothers and sisters?

21 A. Brothers.

22 Q. Please give me their full names?

23 A. Osmar Antonio Castillo Blandon and
24 Oscar Castillo.

25 Q. Where do you currently reside?

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

1 where did you live?

2 A. I've always lived there.

3 Q. So, you've lived there for how many
4 months or years?

5 A. Years. Three years, since I've come
6 here.

7 Q. So, you came to the United States
8 three years ago?

9 A. Yes.

10 Q. When you came to the United States
11 three years ago, you moved in the Bell Avenue
12 address and have stayed there since, correct?

13 A. Yes.

14 Q. During those three years that you have
15 lived at this address, other than Osmar has any
16 other of your brothers lived with you at that
17 address?

18 A. Uncle.

19 Q. What is his name?

20 A. Norwin Sanchez.

21 Q. Did your brother, William Salgado,
22 ever live with you at the Bell Avenue address?

23 A. No.

24 Q. Did you ever live with your brother,
25 William Salgado, before he died?

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

1 A. No.

2 Q. Do you know where William Salgado,
3 your brother, was living at the time you moved
4 into the Bell Avenue address?

5 MR. HOLM: Lacks foundation. Assumes
6 facts. I think you said William Salgado?

7 MR. COLVIN: Yeah. William Salgado,
8 her brother.

9 MR. HOLM: At the Bell Avenue address?

10 MR. COLVIN: Yes.

11 MR. HOLM: Okay.

12 BY MR. COLVIN:

13 Q. I'm just asking -- well let me back
14 up. Can you read back the question, please.
15 (Thereupon, the court reporter was asked to read
16 back the aforementioned question.)

17 THE WITNESS: He lived with my dad.

18 BY MR. COLVIN:

19 Q. When you came here three years ago and
20 moved into Bell, do you know if your brother,
21 William Salgado, was employed at that time?

22 A. Yes.

23 Q. By whom was he employed, if you know?

24 A. He was working in construction.

25 Q. Do you know the name of the

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

1 Q. Before your birthday of October 23rd
2 of 2022, when did you see your brother, William
3 Salgado, before that date?

4 A. I don't remember.

5 Q. Do you know if your brother, William
6 Salgado, was adopted by anyone?

7 A. No.

8 Q. Were you ever told by anyone that he
9 had been adopted?

10 A. No.

11 Q. Did you attend the funeral of your
12 brother, William Salgado?

13 A. Yes.

14 Q. Where was that held?

15 A. I don't remember.

16 Q. Do you know if your brother was
17 cremated?

18 A. Yes.

19 Q. Do you know where his ashes are
20 buried?

21 A. Yes.

22 Q. Where is that?

23 A. Nicaragua.

24 Q. Did you go out to Nicaragua to see his
25 ashes being buried?

KARLA VANESSA BLANDON
JANUARY 09, 2025

JOB NO. 1379427

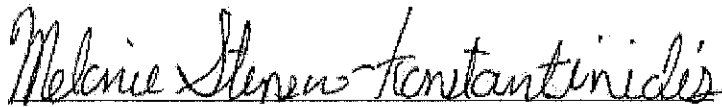
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CERTIFICATE OF OATH

THE STATE OF FLORIDA
COUNTY OF MIAMI-DADE

I, the undersigned authority, certify that
KARLA VANESSA BLANDON personally appeared before me
and was duly sworn.

WITNESS my hand and official seal this
14th day of January, 2025.


MELANIE STINSON-KONSTANTINIDIS, RPR,
REGISTERED PROFESSIONAL REPORTER
Notary Public - State of Florida
My Commission Expires: 5/22/2025
My Commission No.: HH116638